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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**CAREN EHRET, individually and on
behalf of a class of similarly situated
persons,**

Plaintiff,

v.

**UBER TECHNOLOGIES, INC., a
Delaware Corporation,**

Defendant.

Case No. 3:14-cv-113-EMC

**DECLARATION OF JACIE C. ZOLNA IN
SUPPORT OF PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

**Judge: Hon. Edward M. Chen
Courtroom: 5**

1 I, Jacie C. Zolna, declare as follows:

2 1. I am a partner at Myron M. Cherry & Associates, LLC and one of the lawyers
3 representing Plaintiff in this action. I submit this declaration pursuant to Local Rule 79-5(e) in
4 support of Plaintiff's Administrative Motion to File Under Seal. I have personal knowledge of
5 the facts set forth in this declaration and, if called to testify, could and would testify competently
6 thereto.
7

8 2. Defendant Uber Technologies, Inc. ("Uber") designated several discovery
9 responses and documents as "CONFIDENTIAL" or "CONFIDENTIAL – ATTORNEYS' EYES
10 ONLY" pursuant to the protective order entered in this case. Plaintiff intends to attach some of
11 these discovery responses and documents to her Memorandum of Points and Authorities in
12 Support of Her Motion for Class Certification, and also intends to quote from them in her brief.
13 Accordingly, Plaintiff seeks to file the following documents under seal, all of which accompany
14 this declaration in their un-redacted format and are being lodged with the Court:
15

- 16 1) An un-redacted version of Plaintiff's memorandum of law in support of her motion for
17 class certification;
- 18 2) Uber driver training materials (designated confidential by Uber), attached as Ex. C to
19 Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class
20 Certification;
- 21 3) June 6, 2012 email exchange (designated confidential by Uber), attached as Ex. D to
22 Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class
23 Certification;
- 24 4) Spreadsheet of payments to Uber drivers (designated confidential by Uber), attached as
25 Ex. E to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for
26 Class Certification;
- 27 5) PowerPoint presentation on Uber taxi pricing (designated confidential by Uber), attached
28 as Ex. F to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion
for Class Certification;

- 6) March 22, 2013 email exchange (designated confidential by Uber), attached as Ex. G to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 7) March 25, 2013 email exchange (designated confidential by Uber), attached as Ex. H to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 8) Uber's Second Amended Response to Interrogatory No. 6 (designated confidential by Uber), attached as Ex. J to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 9) September 13, 2012 email exchange (designated confidential by Uber), attached as Ex. O to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 10) September 17, 2012 email (designated confidential by Uber), attached as Ex. P to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 11) July 2, 2012 email exchange (designated confidential by Uber), attached as Ex. Q to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification;
- 12) June 6-14, 2012 email exchange (designated confidential by Uber), attached as Ex. R to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification; and
- 13) October 18, 2012 email exchange (designated confidential by Uber), attached as Ex. S to Plaintiff's Memorandum of Points and Authorities in Support of Her Motion for Class Certification.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 16, 2015

By: /s/ Jacie C. Zolna
Jacie C. Zolna

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing **Declaration of Jacie C. Zolna in Support of Plaintiff's Administrative Motion to File Under Seal** upon:

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via the electronic filing system on this 16th day of July, 2015.

/s/ Jacie C. Zolna